

FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

FEB 22 2017

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DEPUTY
SPOKANE WASHINGTON

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UNITED STATES DISTRICT
FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

vs.

CAMERON CORDELL BUTLER,

Defendant.

No. 2:16-CR-142-TOR

SUPERSEDING INDICTMENT

Ct. 1: 26 U.S.C. §§ 5841, 5861(d),
and 5871, Possession of an
Unregistered Destructive
Device

Ct. 2: 26 U.S.C. §§ 5822, 5861(f),
and 5871, Making a
Destructive Device

Cts. 3-4: 18 U.S.C. §§ 2261A(1),
Interstate Stalking

Cts. 5-7: 18 U.S.C. §§ 2261A(2),
Cyberstalking

Ct. 8: 18 U.S.C. § 924(c)(1)(A),
Possession of a Firearm in
Furtherance of a Crime of
Violence

26 U.S.C. § 5872 and 28
U.S.C. § 2461(c)
Forfeiture Allegations

The Grand Jury Charges:

COUNT ONE

From on or about the July 20, 2016 and continuing to on or about July 21, 2016, in the Eastern District of Washington, the Defendant, CAMERON CORDELL BUTLER, knowingly received and possessed firearms, to wit: six destructive devices, defined pursuant to 26 U.S.C. § 5845(a)(8), (f)(1)(A), each such device consisting of a gasoline-filled bottle with a cloth fuse, commonly known as a Molotov cocktail, not registered to him in the National Firearms Registration and Transfer Record, all in violation of 26 U.S.C. §§ 5841, 5861(d), 5871.

COUNT TWO

From on or about July 20, 2016, and continuing to on or about July 21, 2016, in the Eastern District of Washington, the Defendant, CAMERON CORDELL BUTLER, knowingly made firearms, to wit: six destructive devices, defined pursuant to 26 U.S.C. § 5845(a)(8), (f)(1)(A), each such device consisting of a gasoline-filled bottle with a cloth fuse, commonly known as a Molotov cocktail, all in violation of 26 U.S.C. §§ 5822, 5861(f), 5871.

COUNT THREE

From on or about July 20, 2016 and continuing to on or about July 21, 2016, in the Eastern District of Washington and elsewhere, the Defendant, CAMERON CORDELL BUTLER, traveled in interstate commerce from Ritzville, Washington to Post Falls, Idaho and then to Spokane, Washington with the intent to kill, injure,

1 and harass another person, to wit: victim B.H., and in the course of and as a result
2 of such travel placed victim B.H. in reasonable fear of death and serious bodily
3 injury and caused, attempted to cause, and would be reasonably expected to cause
4 victim B.H. substantial emotional distress and using a dangerous weapon: to wit a
5 destructive device defined pursuant to 26 U.S.C. § 5845(a)(8), (f)(1)(A), such
6 device consisting of a gasoline-filled bottle with a cloth fuse, commonly known as
7 a Molotov cocktail, all in violation of 18 U.S.C. §§ 2261A(1), 2261(b)(3).
8

9 10 **COUNT FOUR**

11 On or about July 20, 2016 and continuing to on or about July 21, 2016, in
12 the Eastern District of Washington and elsewhere, the Defendant, CAMERON
13 CORDELL BUTLER, traveled in interstate commerce from Ritzville, Washington
14 to Post Falls, Idaho and then to Spokane, Washington with the intent to kill, injure,
15 and harass another person, to wit: victim P.M., and in the course of and as a result
16 of such travel placed victim P.M. in reasonable fear of death and serious bodily
17 injury and caused, attempted to cause, and would be reasonably expected to cause
18 victim P.M. substantial emotional distress and using a dangerous weapon: to wit a
19 destructive device defined pursuant to 26 U.S.C. § 5845(a)(8), (f)(1)(A), such
20 device consisting of a gasoline-filled bottle with a cloth fuse, commonly known as
21 a Molotov cocktail, all in violation of 18 U.S.C. §§ 2261A(1), 2261(b)(3).
22

23 **COUNT FIVE**

24 On or about July 8, 2016 and continuing to on or about July 21, 2016, in the
25 Eastern District of Washington, the Defendant, CAMERON CORDELL BUTLER,
26 with the intent to kill, injure, harass, and intimidate another person, to wit: victim
27 B.H., used an electronic communication service and an electronic system of
28 interstate commerce and a facility of interstate commerce to engage in a course of

1 conduct that placed victim B.H. in reasonable fear of death and serious bodily
2 injury to himself and to victim P.M., with victim P.M. being an intimate partner of
3 victim B.H., and caused, attempted to cause, and would be reasonably expected to
4 cause victim B.H. and victim P.M. substantial emotional distress and using a
5 dangerous weapon: to wit a destructive device defined pursuant to 26 U.S.C.
6 § 5845(a)(8), (f)(1)(A), such device consisting of a gasoline-filled bottle with a
7 cloth fuse, commonly known as a Molotov cocktail, all in violation of 18 U.S.C. §§
8 2261A(2), 2261(b)(3).
9

10 COUNT SIX

11
12 On or about July 8, 2016 and continuing to on or about July 21, 2016, in the
13 Eastern District of Washington, the Defendant, CAMERON CORDELL BUTLER,
14 with the intent to kill, injure, harass, and intimidate another person, to wit: victim
15 P.M., used an electronic communication service and an electronic system of
16 interstate commerce and a facility of interstate commerce to engage in a course of
17 conduct that placed victim P.M. in reasonable fear of death and serious bodily
18 injury to herself and to victim B.H., with victim B.H. being an intimate partner of
19 victim P.M., and caused, attempted to cause, and would be reasonably expected to
20 cause victim P.M. and victim B.H. substantial emotional distress and using a
21 dangerous weapon: to wit a destructive device defined pursuant to 26 U.S.C.
22 § 5845(a)(8), (f)(1)(A), such device consisting of a gasoline-filled bottle with a
23 cloth fuse, commonly known as a Molotov cocktail, all in violation of 18 U.S.C. §§
24 2261A(2), 2261(b)(3).
25

26 COUNT SEVEN

27
28 On or about July 19, 2016 and continuing to on or about July 21, 2016, in
the Eastern District of Washington, the Defendant, CAMERON CORDELL

1 BUTLER, with the intent to kill, injure, harass, and intimidate another person, to
2 wit: victim L.S., used an electronic communication service and an electronic
3 system of interstate commerce, and a facility of interstate commerce to engage in a
4 course of conduct that placed victim L.S. in reasonable fear of death and serious
5 bodily injury to herself and caused, attempted to cause, and would be reasonably
6 expected to cause victim L.S. substantial emotional distress and using a dangerous
7 weapon: to wit a destructive device defined pursuant to 26 U.S.C. § 5845(a)(8),
8 (f)(1)(A), such device consisting of a gasoline-filled bottle with a cloth fuse,
9 commonly known as a Molotov cocktail, all in violation of 18 U.S.C. §§ 2261A(2),
10 2261(b)(3).
11

12 COUNT EIGHT

13
14 On or about the July 19, 2016 and continuing to on or about July 21, 2016,
15 in the Eastern District of Washington, the Defendant, CAMERON CORDELL
16 BUTLER, did knowingly carry and use six firearms, to wit: six destructive devices,
17 defined pursuant to 26 U.S.C. § 5845(a)(8), (f)(1)(A), each such device consisting
18 of a gasoline-filled bottle with a cloth fuse, commonly known as a Molotov
19 cocktail, during and in relation to a crime of violence for which he may be
20 prosecuted in a Court of the United States, that is, the offenses described in Counts
21 Three and Four of this Superseding Indictment, Interstate Stalking in violation of
22 18 U.S.C. §§ 2261A(1) and 2261(b)(3) and Counts Five, Six, and Seven
23 Cyberstalking in violation of 18 U.S.C. §§ 2261A(2) and 2261(b)(3), all in
24 violation of 18 U.S.C. §§ 924(c)(1)(A), 924(c)(1)(B)(ii).
25

26 NOTICE OF CRIMINAL FORFEITURE ALLEGATIONS

27 The allegations contained in this Superseding Indictment are hereby
28 realleged and incorporated by reference for the purpose of alleging forfeitures

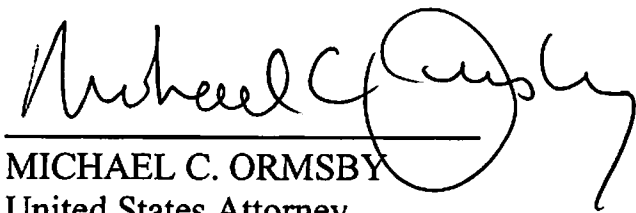
1 pursuant to 26 U.S.C. § 5872 and 28 U.S.C. § 2461(c); or pursuant to 18 U.S.C.
2 § 924(d)(1) and 28 U.S.C. § 2461(c).

3 Pursuant to 26 U.S.C. § 5872 and 28 U.S.C. § 2461(c), upon conviction of
4 the offense(s) set forth in Counts 1 and 2 of this Superseding Indictment,
5 Defendant CAMERON CORDELL BUTLER, shall forfeit to the United States any
6 destructive devices involved in the commission of the offense(s).

7 Pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c), upon conviction
8 of the offense(s) set forth in Counts 3 and 8 of this Superseding Indictment,
9 Defendant, CAMERON CORDELL BUTLER shall forfeit to the United States,
10 any firearms involved in the commission of the offense.
11

12 DATED this 22nd day of February, 2017.

13 A TRUE BILL
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18 MICHAEL C. ORMSBY
19 United States Attorney

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21 JAMES A. GOEKE
22 Assistant United States Attorney
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